

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**PAUL SCOTT,**

*Plaintiff,*

**v.**

**BIERMAN, GEESING,  
WARD & WOOD, LLC, et al.,**

*Defendants.*

**Civil Action No. 3:12cv271**

**MOTION TO DISMISS PORTIONS OF THE COMPLAINT**

Defendants BWW Law Group, LLC, formerly known as Bierman, Geesing, Ward & Wood, LLC, ("**BWW**") and Equity Trustees, LLC ("**Equity**"), by counsel and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, move the Court for the entry of an order dismissing portions of the complaint filed by plaintiff Paul Scott (the "Complaint") for failure to state claims upon which relief can be granted for the reasons and authorities set forth fully in Defendants' accompanying brief. Particularly, the BWW seeks dismissal of part of Count I and all of Count IV, and the Equity seeks dismissal of all four counts.

**Respectfully submitted,**

**BWW LAW GROUP, LLC  
AND  
EQUITY TRUSTEES, LLC**

**By Counsel**

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I further certify that on this date a true and correct copy of the foregoing and the NEF will be mailed, first-class, postage fully prepaid, to:

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